

1 E. MARTIN ESTRADA
United States Attorney
2 MACK E. JENKINS
Assistant United States Attorney
3 Chief, Criminal Division
ANDREW BROWN (Cal. Bar No. 172009)
4 Assistant United States Attorney
Major Frauds Section
5 1100 United States Courthouse
312 North Spring Street
6 Los Angeles, California 90012
Telephone: (213) 894-0102
7 Facsimile: (213) 894-6269
E-mail: andrew.brown@usdoj.gov
8

9 Attorneys for Plaintiff
UNITED STATES OF AMERICA
10

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 CAROLINE JOANNE HERRLING,

17 Defendant.
18

No. 2:23-CR-59-MEMF

STIPULATION TO CONTINUE
SENTENCING

19 Plaintiff United States of America, by and through its counsel
20 of record, and defendant CAROLINE JOANNE HERRLING ("defendant"),
21 both individually and by and through her counsel of record, hereby
22 jointly request a sentencing continuance:

- 23 1. Defendant pled guilty and is currently set for sentencing
24 on July 7, 2023, at 10:00am. No previous sentencing
25 continuances have been sought.
- 26 2. The Probation Office has identified this sentencing as
27 unusually complicated and would like more time to prepare
28 a thorough Presentence Report.

1 3. The information the government is contractually permitted
2 to provide to the Probation Office depends on whether or
3 not defendant complied with her obligations under the plea
4 agreement. The government believes defendant has not
5 complied with those obligations, and intends to file a
6 motion asking the Court to declare that defendant breached
7 the plea agreement.

8 4. Defendant wishes to analyze the discovery materials that
9 the government believes showed she breached her plea
10 agreement. Defendant hopes that the parties can obviate a
11 motion for a declaration of breach of plea agreement.

12 5. The parties hope that a continuance to September 28, 2023,
13 will allow them sufficient time to resolve this issue
14 among themselves, or by briefing it to the Court
15 sufficiently in advance of sentencing so that the
16 Probation Office has all the information it is entitled to
17 when completing the Presentence Report.

18 ///

1 Accordingly, the parties jointly request a sentencing
2 continuance to September 28, 2023, or as soon thereafter as is
3 convenient for the Court.

4 IT IS SO STIPULATED

5 Dated: May 11, 2023

Respectfully submitted,

6 E. MARTIN ESTRADA
United States Attorney

7 MACK E. JENKINS
8 Assistant United States Attorney
9 Chief, Criminal Division

10 Andrew Brown

11 ANDREW BROWN
Assistant United States Attorney

12 Attorneys for Plaintiff
13 UNITED STATES OF AMERICA

14 Dated: May 22, 2023

15 *Alex Kessel*

16 ALEX KESSEL
17 Attorney for Defendant
[By email authorization]